

**GLAVIN.**

Glavin PLLC  
156 W. 56<sup>th</sup> Street, Suite 2004  
New York, NY 10019

glavinpllc.com  
646.693.5505

April 25, 2025

**VIA ECF**

The Honorable Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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**Re: United States v. Sergey Shestakov, 23 Cr. 16 (JHR)**

Dear Judge Rearden:

I represent Sergey Shestakov in the above-referenced matter and write to respectfully request that the Court issue the Letter Rogatory to Request International Judicial Assistance from the Republic of Turkey filed on April 25, 2025 at ECF No. 248. The government takes no position on the letter rogatory.

First, we have not yet heard back regarding our letters rogatory to the United Arab Emirates, the Republic of Serbia and the Republic of Turkey for Mr. Fokin's Rule 15 deposition.

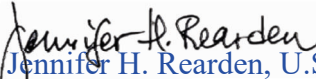
Second, on April 9, 2025, the government informed defense counsel for the first time that the Republic of Turkey may entertain Mr. Fokin providing testimony at a hearing before a Turkish Judicial Authority. Following an exchange of emails, on April 17, 2025 the government suggested Mr. Shestakov submit a second letter rogatory to the Republic of Turkey, specifically requesting a hearing before a Turkish Judicial Authority where Mr. Fokin can provide testimony. We subsequently consulted with local counsel in Turkey on this issue and now submit this second letter rogatory.

Accordingly, we request that the Court issue the attached letter rogatory to the Republic of Turkey.

Application GRANTED. The Court will issue the letter rogatory proposed at ECF No. 248-1.

The Clerk of Court is directed to terminate ECF Nos. 248 and 249.

SO ORDERED.

  
Jennifer H. Rearden, U.S.D.J.  
Dated: April 28, 2025

Respectfully submitted,

/s/ Rita M. Glavin  
Rita M. Glavin